

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**CORNICHE CAPITAL, LLC;
NM GAS HOLDINGS 1, LLC;
NM GAS HOLDINGS 2, LLC;
and DE LiqNM LLC,**

Plaintiffs,

vs.

Case No.: **2:17-cv-00106-CG/SMV**

W & N ENTERPRISES, INC.,

Defendant.

MOTION TO WITHDRAW AND ALLOW SUBSTITUTION OF COUNSEL

COMES NOW Hinkle Shanor LLP (Richard E. Olson and Rebecca Nichols Johnson) and moves to withdraw as counsel for Plaintiffs Corniche Capital, LLC; NM Gas Holdings 1, LLC; NM Gas Holdings 2, LLC; and DE LiqNM LLC (hereinafter referred to collectively as "Plaintiffs"), and to allow substitution of counsel for Plaintiffs in this matter, and as grounds therefore STATES:

1. Plaintiffs and current counsel, by mutual agreement, have determined that Plaintiffs' needs will be better served by Plaintiffs retaining substitute counsel herein. Accordingly, Plaintiffs consent to this Motion.

2. Plaintiffs' address and telephone number is as follows:

Corniche Capital, LLC
NM Gas Holdings I, LLC
NM Gas Holdings II, LLC
DE LiqNM LLC
Attn: David Ebrahimzadeh
170 E. 77th Street, Apt. 7A
New York, NY 10075
(917) 207-7220

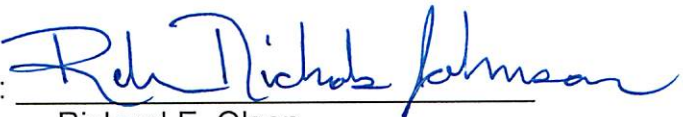
3. Plaintiffs should be granted a reasonable period of time within which to retain substitute counsel to represent their interests in this action, including an extension of time to file an Answer to the Counterclaim against Plaintiffs.

4. Counsel for Defendant has been contacted regarding this Motion, and does not oppose it.

WHEREFORE, counsel for Plaintiffs request that this Court enter an Order allowing Hinkle Shanor LLP to withdraw as counsel for Plaintiffs, setting a time period within which Plaintiffs may retain substitute counsel, granting an extension of time for substitute counsel to file an Answer to the Counterclaim against Plaintiffs, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

HINKLE SHANOR LLP

By: 

Richard E. Olson
Rebecca Nichols Johnson
P.O. Box 10
Roswell, New Mexico 88202-0010
(575) 622-6510
(575) 623-9332 (Facsimile)
E-Mail: rolson@hinklelawfirm.com
rjohnson@hinklelawfirm.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of March, 2017, I electronically filed the above and foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following recipients:

David P. Lutz, Esq.
Martin & Lutz, P.C.
P.O. Drawer 1837
2110 North Main Street
Las Cruces, New Mexico 88004-1837
(575) 526-2449
(575) 526-0946 (Facsimile)
E-Mail: dplutz@qwestoffice.net

Attorneys for Defendant


Rebecca Nichols Johnson